FEDERAL AVIATION ADMINISTRATION

SECTION 508 COMPLIANCE PLAN

Fiscal Year 2005-2007

Version 2.0

Prepared by the:
Information Management Division
Office of the Assistant Administrator for Information Services
and Chief Information Officer

September 30, 2004

EXECUTIVE SUMMARY

This document is the Federal Aviation Administration's (FAA) Section 508 Compliance Plan for fiscal years (FY) 2005-2007. This compliance plan informs of the Section 508 standards and requirements necessary to implement, comply, and institutionalize Section 508 of the Rehabilitation Act of 1973 within the FAA.

On June 14, 2001, Secretary of Transportation issued an access to electronic information technology (EIT) policy statement. The policy requires the Department of Transportation (DOT) to provide access to all of its programs, services, and information to people with disabilities that is comparable to the level of access provided to others. This policy clarifies the mandate that the DOT meet the standards and acquisition requirements of Section 508 of the Rehabilitation Act of 1973.

Section 508 requires that when Federal agencies develop, procure, maintain, or use EIT, they must ensure that EIT allows Federal employees and members of the public with disabilities to have access to and use of information and data comparable to the access and use of information and data by Federal employees, and members of the public, who are not individuals with disabilities-unless an undue burden would be imposed on the agency. Persons with disabilities can file complaints and lawsuits against products that are procured that are not in compliance with the Section 508 standards. Federal agencies are not required to "retrofit" existing technologies.

The Section 508 standards are technical specifications and performance-based requirements that focus on the functional capabilities covered by technologies. There are eight standards as follows:
- Software Applications and Operating Systems
- Web-based Intranet and Internet Information and Applications
- Telecommunications Products
- Video and Multimedia Products
- Self-Contained Closed Products (for example, facsimiles and copiers)
- Desktop and Portable Computers
- Functional Performance Criteria
- Information, Documentation, and Support

Section 508 coordinators have been designated in each of the Lines of Business (LOBs), Staff Offices (SOs), regions, and centers. These Section 508 coordinators will meet periodically as the FAA Section 508 working group to plan and guide the compliance program.

Successful implementation of Section 508 will:
- Provide access to information, programs, and services provided by the Federal Government to 54 million Americans with disabilities.
- Improve accessibility and opportunity for all Americans with disabilities.

This compliance plan details the measures that the FAA will use as guidance to implement compliance activities that will help to institutionalize Section 508 within the agency.

TABLE OF CONTENTS

1.0 Program Overview

1.1 Purpose

This compliance plan is the Federal Aviation Administration (FAA) fiscal year 2005-2007 (FY-05-07) measures for institutionalization of Section 508 of the Rehabilitation Act of 1973, as amended in 1998. It provides the background, strategic alignment, approach, principles, assumptions, products, benefits, and performance measures necessary to execute an agencywide Section 508 Compliance Plan. Besides past awareness activities, this compliance plan will inform of Section 508 standards and requirements necessary to implement, comply, and institutionalize Section 508 within the FAA.

1.2 Background

On August 7, 1998, the President signed into law the Workforce Investment Act of 1998, which includes the Rehabilitation Act Amendments of 1998. Section 508 of the Rehabilitation Act Amendments requires that when Federal agencies develop, procure, maintain, or use electronic and information technology (EIT), they must ensure that EIT allows Federal employees and members of the public with disabilities to have access to and use of information and data comparable to the access and use of information and data by Federal employees, and members of the public who are not individuals with disabilities - unless an undue burden would be imposed on the agency. This is referred to as "comparable access" in the legislation.

Section 508 also requires that individuals with disabilities, who are members of the public seeking information or services from a Federal agency, have access to and use of information and data comparable to that provided to the public who are not individuals with disabilities. If an undue burden can be justified and documented, the legislation still requires that an "alternative means of access" be provided for people with disabilities. The latter is defined in the legislation and focuses on the accessibility of the information and data, rather than technology.

Section 508 requires the agency to provide accessible EIT to employees with disabilities, to enable them to successfully do their jobs and enjoy the same benefits of training and career opportunities that are available to others in the workforce. The person procuring, maintaining, developing, and using EIT is required to ensure that Federal employees and members of the public with disabilities have access and use of information and data - comparable to employees and members of the public without disabilities - unless it is an undue burden to do so.

Section 508 of the Rehabilitation Act Amendments of 1998 requires the Architectural and Transportation Barriers Compliance Board (known as the Access Board) to publish standards that define the terms and technical and functional performance criteria necessary for compliance. The Access Board is an independent Federal agency devoted to accessibility for people with disabilities. The Access Board develops and maintains accessibility standards for EIT. The standards developed by the Access Board were codified in 36 CFR Part 1194, which was published in the Federal Register on December 21, 2000.

People with disabilities can sue agencies that fail to comply with Section 508 in court for noncompliance. The individual with a disability can file a complaint against the FAA and/or may sue the FAA in Federal court. If successful a complainant could be awarded with injunctive relief and attorney fees.

On June 21, 2001, enforcement of Section 508 began with the Federal Acquisition Regulations requiring agencies to procure EIT in a manner consistent with the Access Board standards. Many agencies, as the first step to compliance, began to ensure the websites complied with the Section 508 standards. Enforcement provisions of Section 508 apply only to EIT procured on or after June 21, 2001.

The FAA implemented an active Section 508 Compliance Program. Here are specific Section 508 Compliance Program accomplishments in FY-02-04:
- Conducted website reviews and remediation:
  - Reviewed 60 websites (including top 20 Websites for Internet and Intranet);
  - Reviewed 50, 000 web pages;
  - Conducted spot-checks on at least 200 websites for Section 508 compliance;
- Evaluated and purchased AccMonitor Server software for checking Section 508 compliance for FAA and Department of Transportation (DOT);
- Provided agency coordination:
  - Appointed Section 508 coordinators for each LOB, SO, region, and center;
  - Established communications channel where information is shared among the Section 508 Coordinators, Section 508 Legal Team, Section 508 Procurement Team, Section 508 Legal Team, People with Disabilities Program Managers, Human Resources, Civil Rights Office, and the Department of Transportation's Disabilities Resource Center;
  - Developed Section 508 implementation plan;
  - Conducted monthly meetings for all Section 508 coordinators;
  - Established Section 508 website and Section 508 Help Desk;
  - Established FAA Section 508 guidelines;
  - FAA Section 508 Coordinator participated as speaker at numerous conferences and seminars;
  - Ensured Office of Management and Budget (OMB) Exhibit 300s included appropriate Section 508 language;
  - Communicated issues and concerns to the General Services Administration, OMB and the Access Board;
- Conducted extensive training:
  - Developed training modules for Section 508 history, procurement, web, software, and video and multimedia;
  - Conducted "Train the Trainer" class;
  - Trained over 2800 FAA, DOT, and other personnel in Section 508;
  - Distributed over 3000 Section 508 CDs to various federal agencies and civilian organizations;
- Revised the FAA Acquisition Management System (AMS) to incorporate Section 508 requirements:
  - Provided contracting language in AMS to reflect Section 508 requirements;

o Established Section 508 standard operating procedures (SOPs) for procurements;
o Developed Section 508 Procurement SOPs video.

1.3   Scope of EIT

The scope of Section 508 includes EIT that involves copiers, facsimile (fax) machines, and similar equipment. The term "information technology" is consistent with the definition of information technology in section 5002(3) of the Clinger-Cohen Act of 1996[1]. This includes:

- Web-based Intranet and Internet applications and information,
- Software applications and operating systems,
- Telecommunication products,
- Video and multimedia products,
- Self-contained, closed products (kiosks, calculators, copiers, fax machines, automated teller machines, etc.), and
- Desktop and portable computers.

1.4   Departmental Policy Statement

On June 14, 2001, Secretary of Transportation issued the DOT's Access to Electronic and Information Technology policy statement. The policy requires the DOT to provide access to all of its programs, services, and information to people with disabilities that is comparable to the level of access provided to others. It requires the DOT's EIT meet the Access Board's[2] accessibility standards for people with disabilities, including employees and the customers being served, whenever procuring, developing, maintaining, or using EIT. This policy establishes the mandate that the DOT meet the standards, acquisition, and reporting requirements of Section 508.

The DOT issues yearly Section 508 target activities to the Operating Administrations.

1.5   Strategic Alignment

Section 508 is an electronic government (e-Government) initiatives included in the President's Management Agenda[3]. The FAA's goal is to make the standards and requirements for its implementation a part of daily operations.

---

[1] Information technology means "any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the executive agency…The term information technology includes computers, ancillary equipment, software, firmware and similar procedures, services (including support service), and related resources…"

[2] The Architectural and Transportation Barriers Compliance Board, known as the Access Board, is an independent Federal agency devoted to accessibility for people with disabilities. On December 21, 2000, the Access Board issued accessibility standards for EIT under Section 508 of the Rehabilitation Act, as amended.

[3] The President's Management Agenda is targeted at improving the quality of services to citizens, businesses, governments, and government employees, as well as the effectiveness and efficiency of the Federal Government.

The FAA Section 508 Compliance Plan supports the Flight Plan Goal: Organizational Excellence and the Flight Plan Target: Maintain 'green' on E-Government initiatives of the President's Management scorecard.

FAA will continue to accomplish many Section 508 awareness, training, and compliance planning activities. The overall performance plan objective for FY 05-07 is to:

- Communicate the Access Board standards and program coordination and compliance activities to FAA executives, managers, and personnel that will help to institutionalize Section 508 agencywide.

1.6 Guiding Principles

The following guiding principles and outcomes represent the vision for the FAA's Section 508 Program:

- Section 508 standards will become a part of daily operations within the agency.
- Information, programs, and services will comply with the Section 508 standards.
- EIT within the agency will comply with the standards. This includes:
  - Web-based Intranet and Internet applications and information,
  - software applications and operating systems,
  - telecommunication products,
  - video and multimedia products,
  - self-contained, closed products (kiosks, ATMs, etc.), and
  - desktop and portable computers.
- FAA employees and the public file few complaints about accessibility to EIT.
- Information, programs, and services must include the Section 508 standards, where necessary, and meet or exceed high standards of quality.
- This plan is aimed at enabling, supporting, and achieving Section 508 compliance through the knowledge and skill of "requiring officials." "Requiring officials" include:
  - managers and staff persons with the authority to influence and/or commit Government funds,
  - integrated product team (IPT) members,
  - procurement officials,
  - contracting officers,
  - information resources management specialists,
  - civil rights personnel,
  - human resources personnel,
  - legal personnel,
  - management in headquarters, regions, and centers,
  - union representatives,
  - chief information officers (CIOs),
  - Web masters and developers, content managers and
 - software developers.

1.7 Approach

Each LOB, SO, region, and center will have a Section 508 coordinator. The 508 coordinator will train, conduct assessments, develop and execute a compliance plan, and gather and report information. The Office of the Assistant Administrator for Information Services and Chief Information Officer (AIO) will provide planning, coordination, training, and support necessary to attain Section 508 compliance.

2.0 Program Components

The FAA Section 508 Compliance Plan provides a comprehensive and integrated approach to achieve Section 508 compliance. It consists of the following components:

- Program Coordination
- Awareness and Training
- Assessment Process
- Compliance Planning and Implementation
- Compliance Reviews and Reporting

The figure below summarizes FAA's Section 508 Program:
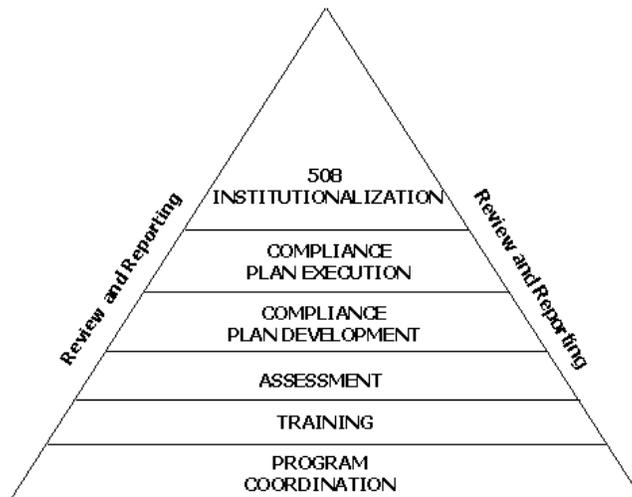
Overview of FAA Section 508 Program

Each organizational component builds on the next component to reach Section 508 institutionalization in the agency. Throughout this process, internal and external reviews and reporting are necessary to monitor compliance within the program.

2.1 Program Coordination

The Section 508 coordinators, under the leadership of the FAA Section 508 coordinator, will share information with the Section 508 points of contact (POCs) within the agency. Section 508 POCs are individuals identified to facilitate Section 508 compliance in the agency. The POCs that the coordinators choose can be personnel that are voluntary and self-identified individuals.

It is expected that the 508 coordinators will mirror the implementation efforts of the FAA Section 508 coordinator. The Section 508 coordinators will work together to train pertinent FAA personnel, conduct agencywide assessments, and plan further compliance activities. During FY 05-07, each Section 508 coordinator will follow FAA's Section 508 Performance Plan.

2.2 Awareness and Training

The Section 508 training team will continue to train FAA personnel. The team developed 5 training modules aimed at increasing the understanding and application of Section 508 standards. These modules provide information on the:

- history of Section 508,
- procurement process within the agency,
- web-based Internet and Intranet information and applications,
- software applications and operating systems, and
- video and multimedia products.

The FAA Section 508 Coordinators will distribute the pamphlet (Appendix II) and the Section 508 Procurement Operating Procedures Video to employees in their LOB, region and center. Each product will help FAA personnel understand the Section 508 requirements.

Former Administrator Garvey signed policy that exists in the AMS that sets acquisition policy for Section 508 compliance. Additionally, the AIO Section 508 team will continue to:

- Participate in FAA forums to inform employees and managers of the Section 508 standards and requirements. This includes meetings to communicate the Section 508 SOPs to Integrated Product Team members, managers, and employees.
- Participate in conference and seminars to inform other agencies, state and local governments and industry of FAA's Section 508 Program accomplishments and lessons learned.
- Prepare and publish informational material to foster FAA Section 508 compliance. This includes team's Web site and articles that heighten the awareness of the Section 508 standards. The FAA Section 508 Website provides accessibility information, procedures, and processes for internal and external customers. The website address is http://intranet.faa.gov/aio/e-government/section_508.
- Maintain a Section 508 Help Desk that provides guidance to employees and managers who have inquiries relative to Section 508 standards.

2.3 Assessment Process

The focus for the next three years will be primarily on the assessment of FAA websites and procurements/contracts/small purchases. These assessments will inform the agency's management as to whether the workforce is aware of the Section 508 requirements. Positive assessments and including the Section 508 requirements in existing and developing processes lets the Chief Information Officer know whether the Section 508 requirements are becoming a part of daily operations.

The first assessment conducted in FY03 was an on-line survey of program managers. The objective was to heighten program manager's awareness of Section 508 and to seek data to use to further develop compliance activities. AIO staff developed an in-house automated tool to collect assessment findings. The results of the assessment are presented in Appendix III. The Section 508 team used these results to develop the FAA Section 508 Performance Plan (Appendix I).

2.4 Compliance Planning and Implementation

The FAA Section 508 Working Group's (comprised of LOB, SO, region and center coordinators) first Section 508 assessment was of program managers. The results show that there continues to be a need to heighten the awareness of Section 508 in the agency.

The Section 508 Compliance Plan provides a high level view of the Section 508 Program. It contains the background, strategic alignment, approach, principles, assumptions, products, benefits, and performance measures. The Section 508 Compliance Plan provides the foundation for the overall program.

The agencywide performance plan (Appendix I) provides guidance on what each executive, manager, and employee can do to institutionalize Section 508 in the agency. The Performance Plan is a means for the Section 508 Program Office to measure compliance activities in the agency. It provides the information on what a person needs to do to comply with each standard as well as provide specific program coordination and compliance activities. It shows actions that need to be accomplished to maintain accessibility of websites, telecommunication products, software and software upgrades, video and multimedia products and self-contained and closed products.

Each person in FAA's workforce should be made aware of the Section 508 standards. When we acquire proof that all procurements include the appropriate language, and that all electronic and information technology that is developed, maintained, procured and used adheres to the Section 508 standards, we will have institutionalized Section 508 in the FAA. Until then we will continue to heighten the awareness of our employees and managers and conduct assessments that let us know whether our workforce is applying the Section 508 requirements in their day to day activities.

2.5 Compliance Review and Reporting

The Attorney General of the Department of Justice (DOJ) has the authority to request biennial reports from Federal agencies to submit to Congress and the President. These reports usually provide information and data to support an agency's compliance effort with the Section 508 standards and requirements. AIO will request at least yearly feedback from the LOBs, SOs, regions, and centers on their Section 508 performance plans. Also, AIO will coordinate all external requests (i.e. DOJ, DOT CIO, and other Federal agencies) for Section 508 compliance information and data gathering actions in the FAA.

3.0 Program Approach

3.1 Action Plan

The following table shows major milestones that help to institutionalize Section 508 in the agency. Training, assessment, monitoring and reporting will be conducted, as needed and if resources are available.

Program Component	Near-Term Objectives (10/04-10/05)	Mid-Term Objectives (10/05-10/07)
Program Coordination	• Disseminate Section 508 information and data to agencywide Section 508 coordinators and POCs	• Collect best practices and lessons learned from other Federal agencies on Section 508 successes and implement within agency
Training	• Disseminate Section 508 Procurement SOP video and pamphlet to coordinators, post to websites and provide training on SOP as needed	• Develop more training tools, as needed
Assessment Process	• Select and use an automated tool to review websites	• Incorporate the automated web checking tool into the Web content management process
	• Develop an agencywide assessment process to determine compliance with the Section 508 standards	• Develop an agencywide assessment process to determine compliance with the Section 508 standards
Compliance Planning and Implementation	• Facilitate the agencywide Section 508 Performance Plan	• Facilitate the agencywide Section 508 Performance Plan
	• Determine what actions need to be taken to ensure compliance in web, software, video, multimedia, telecommunications, and self-contained and closed products	• Determine what actions need to be taken to ensure compliance in web, software, video, multimedia, telecommunications, and self-contained and closed products
Compliance Review and Reporting	• Review and monitor the success of the Section 508 Program	• Monitor the Section 508 Performance Plan to determine progress in implementation
	• Report information and data to external entities such as the DOT CIO and the DOJ	• Report information and data to external entities such as the DOT CIO and the DOJ

The objectives of the FAA Section 508 Compliance Plan are subject to change based on feedback from the Section 508 Working Group or guidance from FAA senior management.

3.2 Roles

AIO has been assigned the leadership role and is actively working with the LOBs to ensure employees and customers have access to information and technologies throughout the agency. In a memorandum dated August 27, 2002, the CIO requested that each member of the Management Board designate a Section 508 coordinator. Under the leadership of the FAA's Section 508 coordinator, each coordinator will have the responsibility for: (1) identifying pertinent personnel and coordinating Section 508 training requirements, (2) conducting a Section 508 self-assessment, (3) developing and executing the Section 508 compliance plan, and (4) responding to Section 508 information requests.

The following table summarizes the roles and participation for each program component:

The duties, skills, and scope of involved positions and organizations are described below. These duties should be incorporated into individual performance plans for accountability.

PROGRAM COMPONENT	TASK	PARTICIPATION	
		LOB/SO	AIO
Program Coordination	FAA-wide coordination and communications		X
	LOB, SO, center, and region coordination	X	
Awareness and Training	Awareness sessions	X	X
	Training planning and execution		X
	Facilitate FAA staff participation	X	X
Assessment Process	Assessment planning activities		X
	Tool development and support		X
	Assessment execution and reports	X	
	Review assessment reports		X
Compliance Planning and Implementation	Further compliance planning	X	
	Compliance execution activities	X	
Compliance Reviews and Reporting	Section 508 reviews and reporting to DOT, DOJ, OMB, etc.		X

3.2.1 FAA Management Board

The FAA Management Board has overall responsibility for Section 508 compliance. Executive responsibilities include:

- Fostering and promoting Section 508 compliance.
- Appointing the Section 508 coordinator for their organization.
- Ensuring the organization's EIT complies with Section 508 standards.
- Participating in the planning and execution of compliance activities.
- Budgeting the resources necessary to institutionalize Section 508 activities.

3.2.2 Office of the Assistant Administrator for Information Services and Chief Information Officer (AIO)

AIO has the lead for coordinating, fostering, and monitoring Section 508 compliance agencywide. The FAA Section 508 coordinator, employed within AIO, provides leadership to the LOB, SO, region, and center Section 508 coordinators and manages the Section 508 Program implementation process.   Specific responsibilities of the FAA Section 508 coordinator include but are not limited to:

- Providing reports to the FAA Administrator on the Section 508 Program's yearly accomplishments, planned accomplishments, and impacts on agencywide resources.
- Providing progress reports and ad hoc information to the Chief Information Officer (CIO), Office of the Secretary (OST), Department of Justice, and other Federal entities related to the implementation of Section 508.

- Working with OST to ensure that the FAA implementation efforts are consistent with departmental policy guidance.
- Providing programmatic and technical guidance and assistance to the LOBs, SOs, regions, and centers on implementing Section 508 of the Rehabilitation Act, as amended.
- Preparing policies and procedures for developing requirements for promulgation by the FAA CIO.
- Providing guidance on developing agencywide performance plan for each LOB to ensure compliance with:
  - Websites,
  - Procurement/acquisition,
  - Complaint processing,
  - Telecommunications,
  - Software,
  - Video and multimedia,
  - Self-contained, closed products, and
  - Desktop and portable computers.

3.2.3   Section 508 Coordinators

The LOB, SO, region, or center Section 508 coordinator is the day-to-day manager of the Section 508 Program within his or her LOB, SO, region or center and represents all matters about the organization's Section 508 compliance. Specific responsibilities of the Section 508 coordinator include:

- Identifying pertinent personnel, points of contact (POCs) and coordinating Section 508 training requirements.
- Identifying POCs with the responsibility to facilitate awareness, understanding, and compliance of the Section 508 standards and requirements within the agency.
- Conducting a self-assessment of the organization's EIT to identify compliance shortcomings and planning corrective action.
- Planning and monitoring completion of corrective actions to attain compliance.
- Providing information and data requests to the FAA Section 508 coordinator upon request.
- Coordinating with other involved organizations and stakeholders.
- Working with their management team to resolve issues and align resources to attain compliance.

3.2.4   Section 508 Working Group

This group is made up of the Section 508 coordinators from the LOBs, SOs, centers, and regions. It includes the FAA Section 508 coordinator. Specific roles include:

- Serving as a clearinghouse for Section 508 issues, resolving those where appropriate and referring those that cannot be resolved to higher management.
- Establishing POCs and other contacts necessary to facilitate and institutionalize Section 508 compliance within the agency.
- Advocating Section 508 Program resources.

- Promoting technical teams (i.e., Web developers and software developers) to meet and resolve Section 508 technical issues.
- Overseeing the components and processes of FAA's Section 508 Program.
- Planning and controlling the execution of the FAA Section 508 Compliance Plan.

3.2.5 Chief Information Officers (CIOs)

The LOB and SO CIOs are responsible for planning, directing, and executing most of the EIT resources within the agency. The CIOs have a role in ensuring that Section 508 compliance is addressed in information technology planning and execution activities for their organization. Specific roles include:

- Contributing to planning and strategizing of Section 508 compliance through the FAA CIO Council.
- Fostering and promoting Section 508 compliance within their organization.
- Supporting and promoting the availability of resources for Section 508 compliance.
- Providing guidance and support to their organization's Section 508 coordinator – when directed by their organization's management.

3.2.6 Resource Management Organizations

The FAA's LOBs and SOs have resource management organizations (referred to as the "dash ten or forty" organizations or Managers of Administration (MOA)) and administrative support staff whose scope includes aspects of EIT acquisition and management. The FAA business managers or program managers accountable under resource management organizations should address nonEIT items. In particular, they acquire certain EIT such as copiers, fax machines, and other office equipment that needs to be Section 508 compliant. As a result, they have a role in ensuring that Section 508 compliance is addressed in information technology planning and execution activities. Specific roles include:

- Contributing to planning and strategizing Section 508 compliance through their management team.
- Fostering and promoting Section 508 compliance within their organization.
- Supporting and promoting the availability of resources for Section 508 compliance.
- Providing guidance and support to their organization's Section 508 coordinator – when directed by their organization's management.

3.2.7 CIO Council

The role of the FAA CIO Council includes:

- Providing guidance and direction to develop components and processes necessary to ensure agencywide Section 508 compliance.
- Reviewing, commenting, and supporting the Section 508 assessment, compliance planning, and implementation processes.

- Recommending plans of action to facilitate the institutionalization of Section 508 agencywide.

3.2.8 Integrated Product Teams (IPTs) and Other Developers
The IPTs must plan and execute their acquisitions in compliance with Section 508. Policy guidance and Section 508 procurement SOPs are located in the AMS.

3.2.9 Information System Managers (ISMs)
The ISMs ensure that Section 508 compliance is attained in their systems. Budgets for their systems need to include Section 508 resources. This includes completion of OMB Form 300s, which have a question on whether the system is Section 508 compliant.

3.3 Key Program Assumptions
Successful implementation of the Section 508 Program is based on the following assumptions:

- LOBs, SOs, regions, and centers designate appropriate personnel as Section 508 coordinators.
- Section 508 coordinators identify and train the appropriate personnel to help in to develop a compliance plan.
- Appropriate FAA personnel participate in the Section 508 training classes.
- Section 508 coordinators work with the appropriate personnel to conduct an assessment within their LOB, SO, region, or center.
- Management supports the assessment process within the agency.
- FAA personnel respond to the assessment questions in a timely manner.
- Management provides resources to support the development and implementation of the compliance plan.

3.4 Acquisition Management System (AMS)
AIO will explore further augmentation of the FAA's AMS to provide guidance and direction on attaining Section 508 compliance. These processes would build on the policy already in the AMS for Section 508 compliance. OMB Exhibit 300s requires that EIT projects answer the question, "How will you ensure compliance with Section 508?" This measure ensures that major systems that are developed include the Section 508 standards.

3.5 Program Products and Benefits
The Section 508 Program will make the FAA information and resources available in multiple forms, enabling broader participation in FAA business processes. Short-term benefits will be realized from training of FAA personnel who will then become knowledgeable of the standards and be able to apply this knowledge to understand how to ensure Section 508 compliance within the agency. Training will assist the LOBs in further planning and implementation of Section 508 compliance. FAA personnel will understand what is required to ensure that people with disabilities have access to information, programs, and services.

Long-term benefits are:

- Compliant FAA Web sites developed in accordance to the Section 508 standards and the process to ensure compliance is incorporated into the Web content management procedures.
- Compliant FAA software and operating systems and all enhancements and modifications are developed in accordance to the Section 508 standards.
- Compliant products that are developed and procured in accordance to the Section 508 standards, including video and multimedia, telecommunications, desktop and portable computers, and self-contained and closed products.
- Increased productivity and participation of employees with disabilities.
- Reduced barriers to employment for people with disabilities.
- Minimized FAA liability from potential noncompliance with Section 508.

3.6   Resources

AIO and the FAA organizations are allocating resources to Section 508 compliance. AIO devoted 2 labor-years to Section 508 in FY-02-FY-05. All FAA organizations have named their Section 508 coordinators. In FY-02, LOBs, SOs, regions, and centers assigned support in the form of Web developers to ensure that the top 20 websites are in compliance with the standards. In FY-03, resources were involved that included those for website changes (labor time of Web developers and Webmasters), travel for training, and other expenditures.

A November 2000 study estimates the total Federal cost of Section 508 compliance with Access Board standards at a range of $85 million to $691 million[4] (lower bound to upper bound of costs) governmentwide. This economic assessment was written by the Access Board, which breaks out the costs associated with compliance of the standards by EIT category. The economic assessment can be viewed at **http://www.access-board.gov/sec/508/508index.htm**. This report is comprehensive; therefore, it was necessary for the FAA to determine the overall impact of Section 508 within the agency.

Early on it was determined that complying with the standards would have an impact on most EIT budgets for computer hardware and software, websites and web applications, multimedia, faxes, printers, and telephone equipment, and will also impact non-EIT budgets for video (including captioning and video description), accessible training materials and documentation, copiers, and televisions. During initial research, it appeared that, in the long run, some kinds of Section 508 costs would not be visible or easy to track since industry is likely to build Section 508 compliance into the systems they sell (such as copiers, fax machines, etc.). Newly acquired systems and commercial-off-the-shelf capabilities should include Section 508 compliance in the contract terms. Requiring officials may wish to track their incremental Section 508 costs by structuring their procurements accordingly. It was anticipated that some FAA programs and acquisitions would experience initial costs in attaining Section 508 compliance, particularly where existing systems or web pages need to be modified to attain compliance.

---

[4] Electronic and Information Accessibility Standards: Economic Assessment, EOP Foundation, November 2000.

Office of the Assistant Administrator for Information
Services and Chief Information Officer, AIO---Draft dated 8/16/04
Page 13
September 30, 2004

During FY-03, the FAA Section 508 coordinator conducted further research to determine the impact within the agency. A section 508 EIT costs data call was sent to all FAA Headquarter, region, and center coordinators. The EIT categories for costs were as follows:

EIT Cost Categories	EIT Cost Categories
Training	Information Kiosks
Website update	Telecommunications
Website Remediation	Desktop and Portable Computers
Update Software Applications	Translation of documentation and instructions into alternate formats
Video and Multimedia Productions	Leased equipment
Copiers	Update televisions to include open and closed captions
Fax machines	Hardware and Software purchases for Help Desk
Printers	Specific 504 needs for an individual
Information Kiosks	
Telephones	

Most 508 coordinators were unable to provide responses to all of the EIT costs categories. Self-contained and closed products and desktop and portable computers were the costs that could be estimated. All other costs were not identified or required further research. The results of the FY 2003 assessment of program managers shows that most managers realize that there is no budget for Section 508 and that costs for compliance for web, software, telecommunications, copiers, and videos are a part of doing daily business. No further research will be conducted in this area at this time.

3.7 Metrics

During FY-05-07, the FAA Section 508 coordinator will document the following metrics to support program implementation:

- Number of DOT/FAA personnel that have taken Section 508 training (viewed video and received pamphlet)
- Number of FAA personnel using an automated tool to ensure websites are Section 508 compliant
- Percentage of Internet and Intranet Websites that comply with the Section 508 standards for the Web
- Number of Section 508 complaints
- Number and types of feedback on the agencywide Section 508 Performance Plan
- Process for review of procurements/contracts/small purchases
- Yearly reports that show whether procurements/contracts/small purchases are in compliance with Section 508

3.8 Risks and Risk Mitigation

The following table summarizes the perceived risks to attaining Section 508 compliance and identifies mitigation strategies for these risks:

Risks	Risk Mitigation Strategies
Insufficient resources available	• The LOBs will work with the Assistant Administrator for AIO to arrange resources • LOBs, SOs, regions, and centers plan for Section 508 compliance within their annual systems budget
Lack of on-going Management Board support	• Consider including Section 508 as a checklist item for JRC reviews of major acquisitions • Periodic or annual reports or briefings to the Management Board on FAA's progress on Section 508 compliance
Lack of support and collaboration from the LOBs, SOs, system managers, IPTs, regions, and/or centers for Section 508 compliance	• Awareness and training • Empowered Section 508 coordinators from each LOB, SO, region, and center • Strong Management Board support • Periodic reports to FAA executive management on Section 508 compliance status
FAA staff or "requiring officials" are unaware of the Section 508 standards and do not participate in the training activities offered by AIO	• Training • Awareness activities • Briefings • AIO's Section 508 Website • Collaboration with FAA CIOs and resource management organizations • Section 508 coordinator's active involvement in EIT activities within the LOB, SO, region, or center

"This document reflects the collaboration of all of the Headquarter, region, and center Section 508 coordinators with feedback from Legal and Lines of Business, when appropriate."

FAA Section 508 Working Group